

**SUMMARY OF THE
QUALITY SYSTEMS PERFORMANCE BASED MEASUREMENT SYSTEMS SUB-COMMITTEE
MEETING
JANUARY 22, 2002**

The Quality Systems Performance Based Measurement Systems (PBMS) Sub-committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Tuesday, January 22, 2002 at 1:00 p.m. Eastern Standard Time (EST) via teleconference. The meeting was led by Chairperson Scott Siders of the Illinois Environmental Protection Agency. A list of action items is given in Attachment A. A list of participants is given in Attachment B. The purpose of the meeting was to discuss the agenda items which follow.

INTRODUCTION

Scott Siders called the meeting to order and took attendance.

REVIEW OF PREVIOUS MINUTES

No minutes were reviewed.

INTERIM MEETING DEBRIEFING

Mr. Siders reviewed some of the comments he received regarding the Quality Systems (QS) session at NELAC 7i. Harry Gearhart felt that the audience identified several areas of very significant concern that must be addressed before a final draft is presented for vote. He summed these up as :

- Lack of consideration of cost benefit versus burden
- Need for tiered approach to recognize existing EPA program methods
- Clarification on method selection and method modification options

Mr. Siders noted that the language used here came directly out of ISO 17025. Mr. Gearhart also observed that a strong concern was voiced that existing regulatory formats are not necessarily compatible with the proposal and that adopting such language would constitute an unreasonable burden on labs and regulated industry.

Some other comments received were:

- Support for a tiered approach.
- Method validation should only be required for new PBMS procedures or when required by the client.
- In SDWA compliance data reporting, only those modifications allowed in writing by the method are allowed. NO other deviations are allowed, whether documented or not.

Mr. Siders noted that as ISO 17025 talks about method modification, "method modification" needs to be defined.

Mr. Gearhart felt that the above listed comments are major issues with the audience and that the

PBMS document needs to be reassessed in order to more specifically address these issues. Thereafter, real effort needs to be made in communicating. In order to allow for that to occur, the document should not be put to vote at NELAC 8. Instead, there should be an effort made to address some of the concerns that had been brought up by involving some of the spokespersons. He suggested spending considerable effort at NELAC 8 and 8i in communicating.

Sheila Meyers supported Mr. Gearhart's position. Ms. Meyers felt that this subcommittee needs more embracing by the QS Committee. She perceived that PBMS does not receive much support from QS. She recommended that someone from QS be a participant on this subcommittee and report back to QS the subcommittee's discussions and results. Mr. Siders agreed that this subcommittee needs to work more closely with the QS committee. Dr. Fred Siegelman, chair of QS, had suggested that Charlie Hooper might be a possibility, although there has been no further development on that subject since. Mr. Siders will contact Dr. Siegelman regarding who from QS will be on the PBMS subcommittee to provide more direct participation. Ms. Meyers also suggested that this subcommittee be careful that whatever changes it proposes relate directly to PBMS, and not just be a rewrite of the QS Standard. Mr. Gearhart also suggested that a broader base of state officials be sought in membership. Mr. Siders agreed that this will not be put up for vote at NELAC 8, however, he suggested preparing language to be ready by NELAC 8i. Mr. Gearhart suggested doing a presentation at 8 and 8i. Mr. Siders stated that a status report will be given at NELAC 8.

Mr. Gearhart suggested involving key EPA personnel during the NELAC 8 and 8i timeframe. This will help ensure that the proposal is compatible with existing regulatory format, as was discussed by Henry Longest at the breakfast meeting during NELAC 7i. Discussion ensued regarding the possibility of Mr. Longest addressing the issue of PBMS in NELAC, and PBMS efforts underway in EPA at NELAC 8. This possibility will be discussed further at the next teleconference.

Other comments:

- PBMS needs to slow down until such time as NELAC is the recognized standard, as it may put some labs at an economic disadvantage with non-NELAC labs.
- PBMS needs to go back to the original ISO language and revisit our words.

The subcommittee will pursue this suggestion and study the ISO language, as well as ISO IUPAC. International, that formalized Guidelines for In House Validation of Methods of Analysis.

Mr. Siders reviewed other comments received, all which were similar to those listed above. Further discussion will ensue at the next teleconference when great attendance is achieved, in order to reach a consensus in the development of a plan of action for the next year. Mr. Siders will develop a draft plan of action and present at the next teleconference for review and discussion.

FUTURE TELECONFERENCES

The next teleconference will be February 12, 2002, at 1:30 p.m. EST.

ADJOURNMENT

There being no further business to discuss, the meeting was adjourned.

ACTION ITEMS
QUALITY SYSTEMS PERFORMANCE BASED MEASUREMENT SYSTEMS SUB-COMMITTEE MEETING
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Item No.	Action	Date to be Completed
1.	Mr. Siders will contact Dr. Siegelman regarding who from QS will be on the PBMS subcommittee.	ASAP
2.	The subcommittee will study the ISO language, as well as ISO IUPAC. International.	ASAP
3.	Mr. Siders will develop a draft plan of action and present at the next teleconference for review and discussion.	02/12/02

PARTICIPANTS
QUALITY SYSTEMS PERFORMANCE BASED MEASUREMENT SYSTEMS SUB-COMMITTEE MEETING
JANUARY 22, 2002

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